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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE PG&E CORPORATION, PACIFIC
GAS AND ELECTRIC COMPANY,

Reorganized Debtors,

- ☒ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☐ Affects both Debtors

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case)
(Jointly Administered)

**JOINDER OF THE LOUISIANA SHERIFFS PENSION & RELIEF FUND IN LEAD
PLAINTIFF PERA AND THE SECURITIES ACT PLAINTIFFS' RESPONSE AND
OPPOSITION TO THE REORGANIZED DEBTORS' THIRTY-THIRD SECURITIES
OMNIBUS CLAIMS OBJECTION**

1 The Louisiana Sheriffs Pension & Relief Fund (“Louisiana Sheriffs”) hereby submits this
2 joinder (the “Joinder”) in Lead Plaintiff PERA and the Securities Act Plaintiffs’ Response and
3 Opposition to the Reorganized Debtors’ Thirty-Third Securities Omnibus Claims Objection (ECF
4 No. 14342) (the “Opposition”). In support hereof, Louisiana Sheriffs states as follows:

5 **BACKGROUND**

6 1. Louisiana Sheriffs is a Securities Claimant that timely filed a proof of claim
7 against PG&E Corporation (“PG&E”) in accordance with the Extended Bar Date Order.
8 Specifically, on April 16, 2020, Louisiana Sheriffs filed Claim No. 100740 against PG&E. On
9 October 13, 2023, Louisiana Sheriffs filed an amendment to proof of claim No. 100740 adopting
10 the allegations in the Third Amended Consolidated Class Action Complaint for the Violation of
11 the Federal Securities Laws (ECF No. 121) filed in *In re PG&E Corp. Sec. Litig.*, No. 3:18-cv-
12 03509 (N.D. Cal.) (the “PERA Complaint”), except the PERA Complaint’s allegations
13 concerning the plaintiffs in that action.

14 2. On December 13, 2023, the Debtors filed the 33rd Omnibus Claim Objection (the
15 “Objection”) [Dkt. No. 14200], which seeks dismissal of the claims filed by numerous Securities
16 Claimants including Louisiana Sheriffs.

17 3. The factual and legal elements of Securities Claimants’ claims, such as the falsity
18 of Debtors’ statements, the scienter of Debtors and their officers in making those statements,
19 whether Debtors’ false statements caused the Securities Claimants’ damages, and the amount of
20 damages per share of PG&E common stock, are common to all Securities Claimants.

21 **JOINDER**

22 4. For the foregoing reasons and the reasons set forth in the Opposition, Louisiana
23 Sheriffs hereby joins in all of the arguments contained in the Opposition in all respects, and adopts
24 and incorporates them herein by reference.

25 **CONCLUSION**

26 5. For the reasons set forth herein and in the Opposition, Louisiana Sheriffs joins in
27 the Opposition and asks that this Court enter an Order denying the Objection.
28

1 Dated: March 15, 2024

Respectfully submitted,

2 **BERNSTEIN LITOWITZ BERGER**
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4 By: /s/ Jonathan D. Uslaner

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